

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>DATE FILED:</b>
<b>v.</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>ANTHONY MARK BIANCHI,</b> <b>a/k/a "Mark"</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. § 2423(e)</b> <b>(conspiracy to engage in illicit sexual</b> <b>conduct in foreign places - 1 count)</b> <b>18 U.S.C. § 2423 (b) (traveling with the</b> <b>intent to engage in illicit sexual conduct -</b> <b>2 counts)</b> <b>18 U.S.C. § 2423 (c) (engaging in illicit</b> <b>sexual conduct in foreign places -</b> <b>2 counts)</b> <b>18 U.S.C. § 2422(b) (using a facility in</b> <b>foreign commerce to entice a minor to</b> <b>engage in sexual activity - 1 count)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

**INTRODUCTION**

At all times material to this indictment:

1. Defendant ANTHONY MARK BIANCHI was a resident of New Jersey and a citizen of the United States. During the period of this indictment, defendant ANTHONY MARK BIANCHI was between 41 and 43 years old.

2. Ion Gusin, who is charged elsewhere, was a citizen of the Republic of Moldova. During the period of this indictment, Gusin was between 26 and 28 years old.

3. G.G. was a citizen of the Republic of Moldova and a person less than 16 years of age.

4. M.M. was a citizen of the Republic of Moldova and a person less than 16 years of age.

5. While traveling overseas, defendant ANTHONY MARK BIANCHI referred to himself as “Mark.”

### **THE CONSPIRACY**

6. From in or about December 2003, until at least October 17, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANTHONY MARK BIANCHI,  
a/k/a “Mark,”**

conspired and agreed with Ion Gusin, and others known and unknown to the grand jury, to travel in foreign commerce for the purpose of engaging in illicit sexual conduct in Cuba, the Republic of Moldova, and Romania, in violation of Title 18, United States Code, Section 2423(b) and to travel in foreign commerce to Cuba, the Republic of Moldova, and Romania, and, while in those countries, to engage in illicit sexual conduct, in violation of Title 18, United States Code, Section 2423(c).

### **HOW THE CONSPIRACY OPERATED**

It was part of the conspiracy that:

7. From in or about December 2003 to on or about October 17, 2005, defendant ANTHONY MARK BIANCHI and Ion Gusin entered into an agreement that defendant

BIANCHI would travel to Cuba, the Republic of Moldova, and Romania with the intent to engage in illicit sexual conduct with G.G. and M.M.

8. Ion Gusin acted as a translator for defendant ANTHONY MARK BIANCHI to communicate with G.G. and M.M in order to engage in illicit sex.

9. Ion Gusin accompanied defendant ANTHONY MARK BIANCHI into villages in Moldova so that defendant BIANCHI could meet young males who were minors and engage in illicit sexual conduct with them.

10. Defendant ANTHONY MARK BIANCHI and Ion Gusin took G.G. and M.M. to pool halls, swimming pools and bowling alleys.

11. Ion Gusin accompanied defendant ANTHONY MARK BIANCHI at overnight stays at hotels. Defendant BIANCHI booked hotel rooms so that he could engage in illicit sexual contact with G.G. and M.M.

12. Defendant ANTHONY MARK BIANCHI gave United States currency and gifts in exchange for illicit sexual relations with G.G. and M.M.

### **OVERT ACTS**

In furtherance of the conspiracy, the defendant, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

### **THE MOLDOVA TRIP**

1. In or about December 2003, defendant ANTHONY MARK BIANCHI traveled from the United States to Moldova.

2. In or about December 2003, in Moldova, defendant ANTHONY MARK BIANCHI met Ion Gusin who agreed to be his translator.

3. In or about December 2003, in Moldova defendant ANTHONY MARK BIANCHI met M.M.

4. In or about December 2003, in Moldova defendant ANTHONY MARK BIANCHI met G.G.

5. In or about December 2003, defendant ANTHONY MARK BIANCHI, Ion Gusin, and M.M. stayed together in the same room at the Casa din Lunca boarding house in Trebujeni, Orhei District, Moldova.

6. In or about December 2003, in Moldova defendant ANTHONY MARK BIANCHI attempted to engage in illicit sexual conduct with M.M.

### **THE CUBA TRIP**

7. On or about December 17, 2004, defendant ANTHONY MARK BIANCHI traveled from Philadelphia International Airport to Cuba by way of Toronto, Canada.

8. Defendant ANTHONY MARK BIANCHI arranged and paid for Ion Gusin and G.G. to meet him in Cuba so that he could engage in illicit sexual conduct with G.G.

9. Ion Gusin acted as a translator between defendant ANTHONY MARK BIANCHI and G.G. in Cuba.

10. Between on or about December 17, 2004, and on or about January 1, 2005, defendant ANTHONY MARK BIANCHI engaged in illicit sexual conduct with G.G. while in hotel rooms in Cuba.

11. On each night between on or about December 17, 2004, and on or about January 1, 2005, in Cuba, Ion Gusin left G.G. alone with defendant ANTHONY MARK BIANCHI for BIANCHI to engage in illicit sexual conduct with G.G.

12. In exchange for illicit sex, defendant ANTHONY MARK BIANCHI paid G.G. \$600.

### **THE ROMANIA TRIP**

13. On or about February 24, 2005, defendant ANTHONY MARK BIANCHI departed the United States from Philadelphia International Airport via Air France Airlines to Romania.

14. Defendant ANTHONY MARK BIANCHI arranged and paid for the travel and lodging expenses for Ion Gusin and M.M. to travel from Moldova to Romania so that he could engage in illicit sexual conduct with M.M. in Romania.

15. Ion Gusin acted as a translator between defendant ANTHONY MARK BIANCHI and M.M. in Romania.

16. On or about March 11, 2005, defendant ANTHONY MARK BIANCHI and Ion Gusin took M.M. to a Romanian pub for his birthday. While at the pub, defendant BIANCHI gave M.M. a very sweet wine to drink. After M.M. became intoxicated, defendant BIANCHI engaged in illicit sexual conduct with M.M.

17. On or about March 12, 2005, defendant ANTHONY MARK BIANCHI gave M.M. \$300 in United States currency in exchange for illicit sex.

### **THE PLANNED TRIP TO THAILAND**

18. On or about July 27, 2005, defendant ANTHONY MARK BIANCHI purchased an airline ticket for himself to travel on October 16, 2005, from JFK International Airport to Bangkok, Thailand.

19. On or about July 27, 2005, defendant ANTHONY MARK BIANCHI purchased two airline tickets for Turkish Airlines for M.M. and Ion Gusin to travel on October 17, 2005, from Kiev, Ukraine through Istanbul, Turkey to Bangkok, Thailand.

20. Between on or about September 21, 2005 and on or about September 24, 2005, these tickets were cancelled.

All in violation of Title 18, United States Code, Section 2423(e).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 12 and Overt Acts 7 through 12 of Count One of this indictment are incorporated here.

2. From on or about December 17, 2004 through on or about January 1, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANTHONY MARK BIANCHI,  
a/k/a “Mark,”**

a citizen of the United States, traveled in foreign commerce, from Philadelphia International Airport via Toronto, Canada to Cuba, for the purpose of engaging in illicit sexual conduct (as defined in Title 18, United States Code, Section 2423(f)), with G.G., a person less than 16 years of age.

In violation of Title 18, United States Code, Section 2423(b).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. From Paragraphs 1 to 12, and Overt Acts 13 through 17 of Count One of this indictment are incorporated here.

2. From on or about February 24, 2005, through on or about March 16, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANTHONY MARK BIANCHI,  
a/k/a “Mark,”**

a citizen of the United States, traveled in foreign commerce, from Philadelphia International Airport to Romania, for the purpose of engaging in illicit sexual conduct (as defined in Title 18, United States Code, Section 2423(f)), with M.M., a person less than 16 years of age.

In violation of Title 18, United States Code, Section 2423(b).



**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 to 12 and Overt Acts 7 through 12 of Count One of this indictment are incorporated here.

2. From on or about December 17, 2004, through on or about January 1, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANTHONY MARK BIANCHI,  
a/k/a “Mark,”**

a citizen of the United States, traveled in foreign commerce, from Philadelphia International Airport via Toronto, Canada to Cuba, and while in Cuba engaged illicit sexual conduct (as defined in Title 18, United States Code, Section 2423(f)), with G.G., a person less than 16 years of age.

In violation of Title 18, United States Code, Section 2423(c).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 to 12, and Overt Acts 12 through 17 of Count One of this indictment are incorporated here.

2. From on or about February 24, 2005, through on or about March 11, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANTHONY MARK BIANCHI,  
a/k/a “Mark,”**

a citizen of the United States, traveled in foreign commerce, from Philadelphia International Airport to Romania, and while in Romania engaged in illicit sexual conduct (as defined in Title 18, United States Code, Section 2423(f)), with M.M., a person less than 16 years of age.

In violation of Title 18, United States Code, Section 2423(c).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about March 12, 2005 through on or about July 23, 2005, in the District of New Jersey and elsewhere, defendant

**ANTHONY MARK BIANCHI,  
a/k/a “Mark,”**

used facilities and means of foreign commerce, that is, the telephone, to attempt knowingly to persuade, induce and entice A.C.N., a person less than 15 years of age and a citizen of Romania, to engage in sexual activity for which defendant ANTHONY MARK BIANCHI could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**